

VOLUME III

ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT

TR 060922

General Plan Amendment Case No. 200900009

CUP No. 200900121

CUP No. 04-075

Oak Tree Permit No. 04-075

Highway Realignment Case No. 200900001



SKYLINE RANCH PROJECT



County Project No. 04-075-(5)
State Clearinghouse No. 2004101090

County of Los Angeles
Department of Regional Planning
Impact Analysis Section
320 West Temple Street
Los Angeles, California 90012-3225

MARCH 2010

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SKYLINE RANCH PROJECT



Prepared by:

PCR Services Corporation

233 Wilshire Boulevard

Santa Monica, California 90401

TEL 310.451.4488

FAX 310.451.5279

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1.0 INTRODUCTION

A. PURPOSE OF THE ADDENDUM

The County of Los Angeles, as the Lead Agency under the California Environmental Quality Act (CEQA), published a Final Environmental Impact Report (Final EIR) for the Skyline Ranch project on February 18th, 2010 and was made available for public review until March 3, 2010. During this review period subsequent two letters were received that included comments on the Final EIR. Although CEQA does not require that responses be provided to comments received on a Final EIR, the County has decided to provide responses to the two letters received in order to address the concerns raised and to clarify and amplify the contents of the Final EIR.

In accordance with Section 15164(c) of the State CEQA Guidelines, an addendum need not be circulated for public review and an additional round of public comments, but can be included in or attached to the Final EIR. The decision-making body, in this case the Los Angeles County Planning Commission, shall consider this Addendum to the Final EIR in conjunction with the Final EIR and other documents prior to making a decision on the project. It should be noted that while this Addendum has not been circulated for public review, the organizations that provided comments on the Final EIR were provided responses to their comments 10 days in advance of the March 24, 2010 hearing on the project.

As discussed above, this Addendum amplifies and clarifies information provided in the Final EIR and does not contain significant new information that would meet the criteria for recirculation of an EIR prior to certification under Section 15088.5 of the State CEQA Guidelines. Section 15088.5 of the State CEQA Guidelines states:

A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 25087 but before certification. As used in this section, the term ‘information’ can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation include, for example, a disclosure showing that:

- (1.) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2.) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3.) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4.) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043).

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies insignificant modifications in an adequate EIR.

B. DOCUMENT ORGANIZATION

This Addendum, which serves as Volume III of the Final EIR, consists of two chapters; Chapter 1, Introduction, and, Chapter 2, Response to Final EIR Comments.

2. RESPONSES TO FINAL EIR COMMENTS

This chapter includes two letters received with comments on the Skyline Ranch Final EIR. The individual letters are each assigned a letter and number. Letter J1, is from the Sierra Club, and Letter J2, is from the Santa Clarita Organization for Planning and the Environment (SCOPE). The comments within these letters that require a response are each assigned a number. For example, the first comment within Letter J1, the Sierra Club letter, is “Comment J1-1.” Each letter with the numbered comments is followed by a set of correspondingly numbered responses (i.e., Response J1-1, Response J1-2, etc.). For certain comments cross references are provided to responses that are included in Volume I of the Final EIR.



March 1, 2010

Michele Bush
County of Los Angeles Dept. of Regional Planning
Impact Analysis Section
Room 1348
320 West Temple Street
Los Angeles, CA 90012

TITLE
Skyline Ranch Project No, 04-075

COMMENTS

The Sierra Club does not believe the issues listed in our original comment letter were adequately addressed or mitigated by the response to comments and proposals in the FEIR.

As both residents of the Santa Clarita Valley and members of the Sierra Club, we are extremely concerned about the ramifications of the "Skyline Ranch Project." The proposed build-out of additional residential lots within the city of Santa Clarita is shocking when one considers the economic, environmental, and societal pressures of the times. The proposed Skyline Ranch project will substantially degrade the quality of the environment in northern Los Angeles County.

A recent trend of development corporations consists of attempts (and many have been successful) to redefine southern California by creating new developments in the midst of our most beautiful remaining open spaces. The proposed Skyline Ranch development area is one of these open spaces. It is situated in the heart of the city of Santa Clarita Valley.

Additionally, there are serious inconsistencies with the County General Plan. The Sierra Club believes that this project clearly requires a General Plan Amendment to update the County Circulation Element. It is not currently consistent with the Master Plan of Highways. Nor will it meet the required traffic service levels to comply with the requirements of the County Development Monitoring System. The project is therefore inconsistent with the Los Angeles County General Plan. The FEIR fails to adequately address or mitigate for these issues.

It is inappropriate to grant General Plan Amendments to individual projects in the middle of a General Plan update. The Sierra Club therefore believes this project must not be approved at this time because of these inconsistencies and should be included in the

General Plan update so that Circulation problems can be addressed and coordinated on a Valley-wide scale.

Cont'd

- Infrastructure

Since year 2007, California has not needed thousands of new homes especially in newer towns such as Santa Clarita. If anything, people should be moving into homes in more urban areas where there are more jobs, public transportation, etc. Foreclosures, bankruptcies, and losses of adequately paying jobs have resulted in a surplus of unoccupied homes; including new homes. Many new homes and small businesses in the Santa Clarita Valley remain uncompleted and/or empty because of the recession, a sick economy, state and federal deficits, and a long-term lack of demand for more new homes. California has the worse debt and economy of any state in the country. Citizens have lost much income and savings over the last year and the project may soon be asking them to spend and buy in an isolated, remote area.

Due to the troubling economic times, many schools in the Santa Clarita Valley have seen a huge drop in enrollment and thus have lost state A.D.A. monies in addition to the extremely detrimental budget cuts coming from both the state and federal government. This has meant that local school districts have had to halt the building of new schools, increase class-sizes, and have either pink-slipped and or let-go of qualified teachers. How would a new development of over a thousand new homes make any of these problems better?

- Biology

Skyline Ranch is a wildlife linkage corridor and the animals that exist on or utilize the property will be losing their habitat and foraging grounds. Native habitat will be destroyed and many of the few pockets of open space will be just that, "islands" within the development. How will this be of any use to the animal species that frequent this wildlife corridor? This makes no sense. Animals that transition through the area (looking for food and water, etc.) will have nowhere to go. If allowed to be built, this project would sever the natural transition zones in the area prohibiting animals from crossing through necessary wildlife corridors. It would also destroy portions of an irreplaceable eco-region.

There are numerous significant impacts to coyotes, owls, toads etc...(many rare species who in many cases are already declining in numbers). However, the impacts always seem to be mitigated to non-significant levels by such things as: monitoring of property by a qualified biologist, relocation of animals, and/or limitations on human and pet access. We ask who the biologist would be? How often would the biologist be checking the property? Is he/she going to walk in front of the bulldozers to see if toads are about to be squished? Where would these animals be relocated to? How would relocating an animal(s) effect the biology of the relocation area and its native species? How can the limiting of human and pet access be enforced?

In other words, what the FEIR promises in mitigations for endangered or rare species is basically not possible.

Cont'd

One such example of an animal species in peril is that of the Black-tailed jackrabbit:

Years ago, one of our Sierra Club members, Don Mullally, was one of a group of people allowed on the land of the proposed project by Newhall Land and Farm to examine natural features and conditions. He was surprised to discover jackrabbits on land proposed for the housing project.

Apparently the hares existed on the part of the project located near the river due to much relatively level and gently sloping open land supporting brush, grasses, and herbs. Steep slopes of the Santa Susana Mountains with woodlands located a short distance south of the project are not inhabited by jackrabbits. In fact, jackrabbits have never been observed by myself or associates on the steep slopes and their canyons in the middle and upper parts of the Santa Susana Mountain Range of Los Angeles County. Similarly, equivalent parts of the Santa Monica Mountains, San Gabriel Mountains, and Verdugo Mountains are also devoid of jackrabbits. Tongues of large valleys such as the San Fernando Valley extend into foothill canyons were formerly habitat for jackrabbits. However, for the most part those have been developed, and jackrabbits are now absent from them.

Jackrabbits were formerly common in all the large valleys of southern California. Don Mullally knows this because he observed the animals. Unfortunately, the California Department of Fish and Game, the Army Corps of Engineers, and the United States Fish and Wildlife Service, and the systems of state and county parks stood by doing nothing while the jackrabbits went extinct in the Santa Clarita Valley, San Fernando Valley, Los Angeles Basin, and the San Gabriel Valley. A few may continue to survive in the low hills and canyons on the northern side of the Simi Valley and in undeveloped locations in valleys east of San Gabriel Valley. The once hare-infested area of Cucamonga also seems to now be devoid of jackrabbits.

Presently the question is – What will be the fate of the jackrabbits on and near the Skyline Ranch project? How far will the people of the Los Angeles greater area need to travel to see a common jackrabbit? Incidentally, the collapse of the noted populations of jackrabbits led to the disappearance of Golden eagles in the Los Angeles Basin and greater area.

As mentioned above, the proposed project would result in the loss of suitable foraging habitat for a variety of species (including mammals such as mountain lions/mule deer, birds such as condors/raptors, reptiles, amphibians, etc.), and the direct loss of special status plant species. It is easy to see that the impacts on animal and plant species will be drastic.

However, the FEIR is very inconsistent when describing potential mitigation measures and other solutions to the problem. When mitigation measures are mentioned they are weak or vague. Case in point, the FEIR states repeatedly that the effects of development will be significant and ultimately unavoidable.

Cont'd

Also, for some reason the County allowed a destructive filming operation on the sensitive Cruzon Mesa, currently proposed for Significant Ecological Area (SEA) designation. This area contained habitat that supported the endangered fairy shrimp, inhabitants of rare California vernal pools such as that found in the Cruzan Mesa. A recent and destructive wildfire was also allowed to burn through this area. CEQA requires that investigation of biological resources must be reviewed on a baseline prior to destruction of native habitat. We believe that this FEIR is inadequate because it does not use the proper baseline biological surveys in the FEIR

Stating that the impacts to wildlife are unavoidable is not acceptable and the mitigation measures suggested are not enough.

- Traffic

People inhabiting the homes potentially created by the Skyline Ranch Development Plan will, for the most part, probably have employment at well paying jobs in distant cities. Each day many thousands of workers and their automobiles will be leaving or returning to the town from these cities. This proposed development will bring thousands of additional car trips a day onto our freeways and surface streets and increase air pollution which is already some of the worst in the nation. Despite the claims of local developers to the contrary, most people who buy homes in the proposed development will simply not be able to work and live in the same community. Jobs in the service sector of local small towns will not yield sufficiently high salaries and wages to meet monthly house payments and other necessary costs. All highways leading to big cities offering high wages will become more crowded with automobiles than they are at present. Traffic congestion was much worse before the poor economy and recession. Traffic on surface streets and along Interstate 5, Highway 14, and along Sierra Highway could become literally unbearable. New homes are not the answer to the needs and wishes of the people living in Santa Clarita Valley and neighboring areas. Traffic congestion is a major concern of the residents of the surrounding areas.

- Air Quality

Another serious concern with the FEIR is the substantial effect the proposed development would have on the worsening air quality that we have in our area. It is obvious that the cumulative air pollutant emissions in the area would contribute to the degradation of local and regional air quality. The Santa Clarita Valley already has some of the worst air quality in the nation. Katherine Squires, a local teacher, sees the effects of poor air quality on the children in her Canyon Country classroom. Each year she sees more and more students who suffer from asthma. The SCV already exceeds Federal air pollution standards for particulate matter generated from dust and diesel pollution.

In addition, there would be long term effects resulting from the additional traffic on our local roads and freeways. Climatologists agree that greenhouse gases are causing global warming and even the Supreme Court, in its decision several months ago, said that EPA must address Carbon Dioxide as a pollutant. These two facts alone suggest that further discussion of global warming should appear in this FEIR. The project should not be approved without making public transportation available to its future residents.

Cont'd

- Geology and Paleontology

The proposed development is situated in an area prone to extreme tectonic activity (at the same rate of uplift as that which created the Himalaya Mountains). The area is in a regional setting of demonstrable high seismic risk. Consider the aftermath of a major earthquake on the people that could potentially reside in the proposed 1260 units.

It is challenging for the reader to be more specific about the geology and paleontology of the area because the property has historically been off-limits to researchers and scientists. Such individuals have been denied access. Therefore, it is necessary to consult the few papers that discuss the area on and adjacent to the property (from many years ago). Past research demonstrates the fact that the site has important and rare megafauna including vertebrate remains of: camels, horses, antelopes, rhinos, and various carnivores. More research needs to be done before evaluating the “significance” of this project’s ramifications.

This rich diversity of megafauna from the Late Miocene/Early Pleistocene (5-6 Million years old) can yield valuable information about paleoclimate, biostratigraphy, and chronostratigraphy. Unfortunately, it is hard to be specific about the Soledad Basin area’s non-marine resources because paleontologic knowledge of this stratigraphic unit in the proposed project area has been severely hampered by the land owner’s long-standing policy that forbids any research that might jeopardize their development plans. This lockout of research has also hampered detailed stratigraphic analysis of the nonmarine Mint and Saugus Formations in the critical area of the proposed development.

As their scientific tools improve with time, stratigraphic sections like the one proposed will be invaluable. This is the developers opportunity to leave a legacy that demonstrates they are a progressive corporation, much like the Tejon Ranch owners of the newly approved Tejon Ranch projects.

The paleontologic part of the FEIR is riddled with redundant and generalized non-informative statements. Details are sorely lacking, and these details are definitely needed before the merits of the FEIR can be determined by the readers of this document. It is extremely self-serving to mention the rich diversity of fossils in the various stratigraphic units and then to provide no details because independent researchers have been denied access to the area for decades.

The proposed project is excessively massive, and the impact on the geological and paleontological resources are permanent and unforgiving. Every effort must be made to preserve as much pristine area as possible.

Cont'd

Where will the fossils that are found during grading be stored? The developer should pay for the storage space and storage cabinets needed to house the fossils found on the site. Storage cabinets could be placed at the Natural History Museum of Los Angeles County. But of course, the question remains, has the Natural History Museum of Los Angeles County been contacted about receiving the material? Do they, in fact, have the space?

Additionally, there needs to be a guarantee that the paleo-monitors have a degree in geology and have had a course in paleontology/paleontology lab whereby they have learned to recognize invertebrate fossils. Hiring untrained paleo-monitors who have never had a course in the identification of invertebrate fossils would be unacceptable.

- Green Building Standards

The Sierra Club requests that green building standards be included as conditions of any approval that might be considered.

- Fire Hazard

This project is in an extremely high fire hazard zone. It was recently burned over by a destructive arson fire pushed by Santa Ana winds that burned 38,000 acres. Had this fire occurred after this project was built, many homes would have been lost.

The Sierra Club opposes further sprawl projects in the urban interface that are indefensible from wildfires. Such projects will cost enormous amounts of taxpayer dollars to fight future wildfires. Project approvals in high fire hazard zones should require, at the least, additional mitigation funding for fire fighting so that this burden is not placed on tax payers at a later date.

Further, there is inadequate fire service for this project and inadequate ingress and egress to provide swift emergency service and evacuation for residents.

- Water Resources

The area in which this project is located does not have sufficient ground water to support additional housing.¹ Therefore water to serve this project must come from the State Water Project (SWP) or the western reaches of the Santa Clara River.

The Water Supply Assessment (WSA) for the project does not include the recent Federal Court decisions and Biological Opinions that have reduced pumping from the

¹ See well graphs available through Santa Clarita Water Co.

Sacramento Delta², and thus reduced water availability to the SWP. A new Water Supply Assessment that includes the impact of reduced pumping required by these decisions must be included in the review of this project to determine whether the water supply is adequate to support the project.

Cont'd

Should cutbacks of state water supply continue, the only source of sufficient ground water is in the western end of the Santa Clarita Valley³. The Santa Clara River is not adjudicated, so this water is available to the project, however extensive piping and pumps must be installed to make it available to locations in the eastern portion of the Santa Clarita Valley.

Water in the western reaches of the Santa Clara River is currently also being considered for use by Newhall Ranch. Both projects cannot be supported by this water supply. A cumulative analysis must be conducted as required by CEQA and the SB610 to ensure an adequate water supply.

Ammonium Perchlorate Pollution

In 1997 ammonium perchlorate contamination was discovered in the Saugus and alluvial aquifers of the Santa Clarita Valley. Since that time, six municipal drinking water wells have been closed down⁴, some of them permanently. Since the Saugus Aquifer is the drinking water supply long depended on in Santa Clarita as the emergency drought back up as well as a major source of daily supply, its contamination has been a blow to the reliability of local water supplies.

Ammonium perchlorate pollution affects the function of the thyroid gland causing hypothyroidism. Reduced thyroid function in pregnant women may cause retardation in the fetus.

In 2000 the Castaic Lake Water Agency (CLWA) and other local purveyors filed litigation against the Whittaker Berrite project to force them to clean up the water supply or pay for the clean up. Several years later a settlement agreement was reached that provided for funding to clean up two of the Saugus wells polluted by this contamination and one of the Alluvial wells.

In 2004, the Sierra Club and Friends of the Santa Clara River won an appellate court decision requiring disclosure of the ammonium perchlorate pollution and requiring a time line for the clean up in CLWA's Urban Water Management Plan⁵.

² *Natural Resources Defense Council v Kempthorne*, 506 F.Supp.2d 322 (E.D. Cal. 2007) (*Wanger Decision - Delta smelt*); and *Pacific Coast Federation of Fishermen's Associations, et al. v. Gutierrez, et al.*, No. 06-CV-00245-OWW-GSA (E.D. Cal. 2008) (*Wanger Decision - Chinook salmon/steelhead*).

³ Groundwater Basin Yield, 2008, Ludhdroff and Scalmanini and GSI Solutions, Inc., 2009, hereby included by reference in this administrative record.

⁴ Stadium Well, Valencia Well Q2, Valencia Well 157, Saugus 1 and 2, NCWD 11

⁵ *Friends of the Santa Clara River v. Castaic Lake Water Agency et al.*, 2004, CalAp5

Since then the Sierra Club has remained concerned that the facilities to provide this clean up continue to be delayed while thousands of additional housing units are approved. These facilities are still not operating as of the date of this letter.

Cont'd

In addition to these delays, it was previously represented that the two wells designated to provide “capture” and clean up of the ammonium perchlorate (Saugus Well 1 and 2) would be returned to their previous production levels. However, CLWA found that production was significantly reduced by 50% in those two wells by the clean up process.⁶

Due to these significant delays and reductions in water supply, the Angeles Chapter of the Sierra Club passed a resolution⁷ calling for the halt to housing approvals until the ammonium perchlorate treatment facilities are functioning to provide the community with its

Conclusion for Water Section

The Santa Clarita Water Co. is wholly owned by Castaic Lake Water Agency. It is in the interests of CLWA to promote projects that will buy additional state water project water from CLWA, the state water wholesaler for the Santa Clarita Valley. This fact creates a conflict of interest. We believe an independent source should provide the water supply information for this company’s projects in order to ensure their accuracy. All agencies should carefully review the water supply information for errors or omissions.

The Sierra Club believes a monopoly control that does not separate the retailer from the wholesaler of water supply may create serious problems for our community. The potential unwanted outcome may lead to poor planning, direction of water resources to only certain projects or water hoarding that impedes communities in their efforts to fairly distribute this precious resource. Such serious ethical issues should be held in mind as this project is reviewed and addressed by the decision-makers.

Attachments:

1.Saugus Well Production Chart from information provided by Castaic Lake Water Agency

2.Sierra Club Resolution 7-23-06

CONCLUSION

The Sierra Club is concerned that if the proposed Skyline Ranch development plan succeeds with county government, the entire region in the heart of the Santa Clarita Valley will become nearly continuous urban and suburban development. The water

⁶ See attached chart of Saugus Well Production Chart

⁷ Resolution approved 7-23-06, attached

situation could become unbelievably serious. Furthermore, many of the values of southern California will be forever lost (scenic open spaces, habitat for wildlife, and a rich variety of fossil resources etc.). The Skyline Ranch development plan could set in place a dangerous precedent. The National Sierra Club has a policy against urban sprawl projects such as this one due to their unsustainability and wasteful use of resources. It is requested that mitigation (including green building standards, a corridor for wildlife movement and public transportation for commuters that will live in the project) be provided that would reduce the disclosed impacts.

At this time the Sierra Club favors the development alternative. We want to ensure reduced density and to be guaranteed that our environmental concerns (lack of water and infrastructure, traffic, air quality, and wildlife corridors, etc.) are sufficiently addressed.

Sincerely,

Katherine Squires

Conservation Chair, Santa Clarita Group

LETTER NO. J1

Katherine Squires, Conservation Chair,
Sierra Club, Santa Clarita Group
3435 Wilshire Boulevard, Suite 320
Los Angeles, CA 90010-1904

RESPONSE NO. J1-1

Responses to each of the Sierra Club's comments on the Draft EIR were thoroughly responded to in Chapter 2.A, Responses to Individual Comments, in Volume I of the Skyline Ranch Final EIR. Although the California Environmental Quality Act (CEQA) does not require that responses be provided to comments on the Final EIR, responses to the Sierra Club's follow-up comments presented in the letter to the County dated March 1, 2010 are addressed below.

RESPONSE NO. J1-2

This comment is identical to Comment E1-2 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1.2 in Volume I of the Final EIR. Also, as a point of clarification, the proposed project is not located within the City of Santa Clarita, it is located in an unincorporated area of Los Angeles County.

RESPONSE NO. J1-3

This comment is identical to Comment E1-3 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1.3 in Volume I of the Final EIR.

RESPONSE NO. J1-4

The comment states concerns that the project requires a General Plan Amendment to update the County Circulation Element and that it is not consistent with the General Plan and fails to adequately address or mitigate for these issues. These issues were thoroughly addressed in both the Draft EIR and the Final EIR.

At the time the Draft EIR was prepared, it was anticipated that the highway realignment of Whites Canyon Road to the proposed Skyline Ranch Road alignment would be approved as proposed as part of the County's pending updated General Plan and updated Area Plan for the Santa Clarita Valley (or the One Valley One Vision [OVOV] plan). At the time the Draft EIR was prepared, approval of the updated County General Plan was anticipated to be December 2009 and therefore prior to the final public hearing before the Regional Planning Commission and Board of Supervisors for the Skyline Ranch Draft EIR. Because the approval process for the updated County General Plan and OVOV has been delayed, County staff requested that the Skyline Ranch project initiate the General Plan Amendment request for the realignment of Skyline Ranch Road. Because a new entitlement was requested, for the December 16, 2009 continued public hearing at the Regional Planning Commission, the County provided new and revised notices of public hearing in compliance with County Code Sections 21.16.070 and 22.60.174, posted the project site in compliance with County Code Sections 21.16.075 and 22.60.175, and posted the revised notice on the County's website at: <http://www.planning.lacounty.gov/case/all> and published in The Signal on November 13, 2009 and La Opinion on November 14, 2009. The revised notice included the request for a General Plan Amendment to amend the Los Angeles County Master Plan of Highways to realign Whites Canyon Road to the proposed Skyline Ranch Road alignment as a secondary highway from Plum Canyon Road to Sierra Highway.

However, the proposed realignment of Skyline Ranch Road, as envisioned in the updated General Plan and OVOV, was described and analyzed throughout the Draft EIR. As stated on page 2-17 in Chapter 2.0, Project Description, of the Draft EIR, this realignment is shown on the County's Draft Highway Plan, a component of the Draft General Plan, and was conditionally approved as Skyline Ranch Road by the Los Angeles County Department of Public Works on July 19, 2006. See also Chapters 2.0, Project Description, pages 2-14 through 2-26; 4.A Geotechnical Resources, page 4.A-12 and Figure 4.A-4; and 4.C, Biological Resources, pages 4.C-64 and 4.C-65. The addition of this approval is noted in Chapter 3.0, Corrections and Additions to the Draft EIR, in Volume I of the Final EIR.

RESPONSE NO. J1-5

See Response J1-4.

RESPONSE NO. J1-6

This comment is identical to Comment E1-4 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-4 in Volume I of the Final EIR.

RESPONSE NO. J1-7

This comment is identical to Comment E1-5 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-5 in Volume I of the Final EIR.

RESPONSE NO. J1-8

This comment is identical to Comment E1-6 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-6 in Volume I of the Final EIR.

RESPONSE NO. J1-9

This comment is identical to Comment E1-7 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-7 in Volume I of the Final EIR.

RESPONSE NO. J1-10

This comment is similar to Comment E1-8 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-8 in Volume I of the Final EIR.

RESPONSE NO. J1-11

This comment is identical to Comment E1-9 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-9 in Volume I of the Final EIR.

RESPONSE NO. J1-12

This comment is identical to Comment E1-10 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-10 in Volume I of the Final EIR.

RESPONSE NO. J1-13

This comment is identical to Comment E1-11 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-11 in Volume I of the Final EIR.

RESPONSE NO. J1-14

This comment is similar to Comment E1-12 and Comment E1-13 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-12 and Response E1-13 in Volume I of the Final EIR.

RESPONSE NO. J1-15

This comment is identical to Comment E1-14 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-14 in Volume I of the Final EIR.

RESPONSE NO. J1-16

This comment is identical to Comment E1-15 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-15 in Volume I of the Final EIR.

RESPONSE NO. J1-17

This comment is identical to Comment E1-16 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-16 in Volume I of the Final EIR.

RESPONSE NO. J1-18

This comment is identical to Comment E1-17 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-17 in Volume I of the Final EIR.

RESPONSE NO. J1-19

This comment is identical to Comment E1-18 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-18 in Volume I of the Final EIR.

RESPONSE NO. J1-20

This comment is identical to Comment E1-19 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-19 in Volume I of the Final EIR.

RESPONSE NO. J1-21

This comment is identical to Comment E1-20 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-20 in Volume I of the Final EIR.

RESPONSE NO. J1-22

This comment is identical to Comment E1-21 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-21 in Volume I of the Final EIR.

RESPONSE NO. J1-23

This comment is identical to Comment E1-22 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-22 in Volume I of the Final EIR.

RESPONSE NO. J1-24

This comment is identical to Comment E1-23 in Volume I of the Final EIR, see Response E1-23 in Volume I of the Final EIR. Additionally, the California Department of Water Resources (DWR) recently issued the 2009 Draft State Water Project (SWP) Reliability Report¹, which the Castaic Lake Water Agency (CLWA) is using as guidance for assessing the availability of SWP water supplies.² The Draft 2009 SWP Reliability Report incorporates regulatory requirements for SWP and Central Valley Project operations in accordance with U.S. Fish and Wildlife Service and National Marine Fisheries Service biological opinions. Estimates of future reliability also reflect potential impacts of climate change and sea level rise. The Draft 2009 SWP Reliability Report is the most current information available.

Table 1 compares estimates of SWP Table A deliveries for current (2009) conditions for average and dry years that were included in the 2007 SWP Delivery Reliability Report with those from the Draft 2009 report. As shown, 2009 estimates of updated SWP deliveries under current conditions during average conditions are slightly less than the 2007 estimates and estimated deliveries during dry periods are essentially the same.

¹ California Department of Water Resources, *Draft 2009 State Water Project Reliability Report*, 2010.

² Ford, Jeff, *Water Resources Planner, Castaic Lake Water Agency*, 2010.

Table 1**Average and Dry Period SWP Table A Deliveries from the Delta under Current Conditions**

Study of Current Conditions	SWP Table A Delivery from the Delta (in percent of maximum Table A)^a					
	Long-term Average^b	Single dry-year (1977)	2-year drought (1976-1977)	4-year drought (1931-1934)	6-year drought (1987-1992)	6-year drought (1929-1934)
2007 SWP Reliability Report, Study 2007 ^b	63%	6%	34%	35%	35%	34%
Updated Studies (2009) ^c	60%	7%	36%	34%	35%	34%

^a Maximum Table A Amount is 4,133 thousand acre feet/year.

^b Values reflect averaging annual deliveries from the two scenarios of Old and Middle River flow targets.

Source: California Department of Water Resources, 2009 State Water Project Delivery Reliability Report, 2010, Table 6.4.

Table 2 compares estimates of SWP Table A deliveries for future (2029) conditions for average and dry years that were included in the 2007 SWP Delivery Reliability Report with those from the Draft 2009 SWP Reliability Report. As indicated, estimates of updated SWP deliveries during dry periods are about the same as the 2007 report for four-year and six-year droughts. Deliveries during the 2-year drought are estimated to increase by 11 to 12 percent when compared to the 2007 estimate, and deliveries during a single dry year are estimated to increase by 4 to 5 percent.

Table 2**Average and Dry Period SWP Table A Deliveries from the Delta under Future Conditions**

Study of Future Conditions	SWP Table A Delivery from the Delta (in percent of maximum Table A)^a					
	Long-term Average	Single dry-year (1977)	2-year drought (1976-1977)	4-year drought (1931-1934)	6-year drought (1987-1992)	6-year drought (1929-1934)
2007 SWP Reliability Report, Study 2007 ^b	66-69%	6-7%	26-27%	32-37%	33-35%	33-36%
Updated Studies (2029)	60%	11%	38%	35%	32%	36%

^a Maximum Table A Amount is 4,133 thousand acre feet/year.

^b Range in values reflects four modified scenarios of climate change: annual Table A deliveries were first interpolated between full 2050 level and no climate change scenarios, then averaged over the two scenarios of Old and Middle River flow targets.

Source: California Department of Water Resources, Draft 2009 State Water Project Delivery Reliability Report, 2010, Table 6.13.

Thus, the 2009 projections for average deliveries are somewhat lower than those included in the 2007 SWP Reliability Report, but under some scenarios, deliveries would be similar or even greater. CLWA has evaluated its water supplies in light of the 2009 Draft SWP Reliability Report and has concluded that they remain adequate through 2030 for the forecasted demand in the 2005 UWMP as previously reported³. The conclusions of the Draft EIR and the Water Supply Assessment for the proposed project remain unchanged.

RESPONSE NO. J1-25

This comment is identical to Comment E1-24 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-24 in Volume I of the Final EIR. Also refer to Response J1-26 above regarding the availability of SWP water supplies.

RESPONSE NO. J1-26

This comment is identical to Comment E1-25 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-25 in Volume I of the Final EIR.

RESPONSE NO. J1-27

This comment is identical to Comment E1-26 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-26 in Volume I of the Final EIR.

RESPONSE NO. J1-28

This comment is identical to Comment E1-27 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no

³ Ford, Jeff, *Water Resources Planner, Castaic Lake Water Agency, 2010.*

specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-27 in Volume I of the Final EIR.

RESPONSE NO. J1-29

This comment is identical to Comment E1-28 in Volume I of the Final EIR, see Response E1-28 in Volume I of the Final EIR. However, by way of an update, treated water is expected to be available for use as a water supply in July 2010, rather than early 2010.⁴

RESPONSE NO. J1-30

This comment is similar to Comment E1-29 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-29 in Volume I of the Final EIR.

RESPONSE NO. J1-31

This comment is identical to Comment E1-30 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-30 in Volume I of the Final EIR.

RESPONSE NO. J1-32

This comment is identical to Comment E1-31 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-31 in Volume I of the Final EIR.

RESPONSE NO. J1-33

This comment is identical to Comment E1-32 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no

⁴ Ford, Jeff, *Water Resources Planner, Castaic Lake Water Agency, 2010.*

specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-32 in Volume I of the Final EIR.

RESPONSE NO. J1-34

This comment is identical to Comment E1-33 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-33 in Volume I of the Final EIR.

RESPONSE NO. J1-35

This comment is identical to Comment E1-34 in Volume I of the Final EIR. As no changes have occurred that would alter the response to this comment provided in the Final EIR, and no specific issues have been raised by the Sierra Club regarding the adequacy of the response, please see Response E1-34 in Volume I of the Final EIR.

SCOPE

Santa Clarita Organization for Planning and the Environment

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



3-3-10

Los Angeles County Regional Planning Commission
and Ms. Susan Tae, Planner
320 W. Temple St.
Los Angeles, CA 90012

Re: Skyline Ranch DEIR and FEIR

Honorable Commissioers and Ms. Tae:

The Notice of Availability for this project states that comments on the FEIR will be accepted into the record until March 3rd. Therefore these comments are timely filed. Should additional information be considered or the public hearing be continued, we request that the comment period also be continued.

First, it was very surprising to us to receive a Final EIR in the mail on this project. It was our understanding that, as stated in the last public hearing, this General Plan Amendment would be reviewed AFTER the update to the Santa Clarita Area Plan update.

We believe that it is inappropriate to approve a plan amendment for a particular development while the County and the City are both in a coordinated process to update the Santa Clarita Area Plan.¹ This project does not fit the vision of the proposed for the Santa Clarita Area General Plan update, which, to comply with concepts of good planning, state-mandated SB375 and the regional SIP, promotes higher density projects near transportation nodes.

Skyline Ranch not only is NOT near any public transportation source, it will also add to the congestion on Bouquet Canyon Road, Sierra Highway and Soledad Canyon Road and all other access roads in exceedence of levels allowed in the LA County Development Monitoring System.

¹ Santa Clarita Area Plan Update R2007-0126, Plan Amendment 2009-0006 and associated permits – One Valley One Vision, DEIR Executive Summary, page 1.0-1

“One Valley One Vision (OVOV) is a joint effort between the County of Los Angeles (County), City of Santa Clarita (City), and Santa Clarita Valley (Valley) residents and businesses to create a single vision and set of guidelines for the future growth of the Valley and the preservation of natural resources. Realizing that development within both jurisdictions can have regional implications, the County and City have jointly endeavored to prepare planning policies and guidelines to guide future development within the Santa Clarita Valley.”

It should be noted that the DEIR does not discuss a General Plan Amendment at all. Although staff reports indicate such an amendment, the DEIR itself does not. Since changes to the circulation plan will affect the whole Valley, the fact that this project will amend the current Plan should be discussed. Therefore the EIR does not serve as an informational document.

Page 23 of the Notice of Preparation states that the project may also require a zone change. Since much of this project is located in an agricultural zoning, we do not understand why the project did not require a zone change. The lack of a zone change seems inconsistent with the processing followed for other projects and inconsistent with the General Plan.

In order to address the volatile water situation in the Santa Clarita Valley, and, as stated above, believing that a Final would not be issued before a General Plan update was completed, we decided to wait to provide comments until closer to a final review period. We wanted our comments on water supply to be as accurate and current as possible.

We continue to have several concerns with this project that have not been addressed in the environmental documents.

Failure to Comply with the LA County Development Monitoring System

County Urban Expansion Areas such as the Santa Clarita Valley are subject to the County's Development Monitoring System (DMS). The DMS is a General Plan Amendment (SP 86-173) that was authorized by the Board of Supervisors on April 21st, 1987.

The DMS came into existence as a settlement agreement to resolve public interest litigation brought by the Center for Law and the Public Interest over the proposed increase in population projections in the 1987 General Plan. As a Court ordered Amendment instituted as settlement, the County cannot ignore it, or pretend it doesn't exist

Developed with the overview of James Kushner acting as Court referee, the DMS aimed to address these infrastructure needs. In an article written by Mr. Kushner, he stated:

“The Los Angeles County Development Monitoring System (DMS) utilizes computer technology to determine capital facility supply capacity and demand placed upon that system by each approved and proposed development. The computer warns decision-makers when demand exceeds capacity and instructs planners on system capacity expansion to meet projected demand.”²

The DMS for this project is extremely out of date since completed 4-28-04 nearly six years ago. Many projects have been approved since that date including the 1100 Unit Riverpark Project, the 500 unit Soledad Townhomes project and the 900 Unit Keystone Project in the City of Santa Clarita. Projects in the County Area include the 500-unit Tick Canyon and other smaller projects. Such a large number of approvals warranted an update to this planning tool during the review of the DEIR.

² “Zoning and Planning Law Report”, May 1988

Further, even with the NOP, no analysis of existing traffic levels were included with the “Urban Services Analysis” as required for the DMS. The 2004 analysis seems to incorrectly find Fire Service not to be significant even though the distance to the nearest fire station substantially exceeds that allowed by the DMS and the project is located in a very high fire hazard zone. The project area suffered major wildfires in the recent past, including the 38,000-acre Buckweed fire in 2007. A Fire Dept letter dated 12-21-04 stated that response times were not adequately calculated.³ To our knowledge, no additional fire stations have been built near this project.

The Water Service Analysis was completed in 2004, prior to the major reductions in State Water Supply as a result of compliance with the Endangered Species Act and the current drought.

All other service areas exceed DMS requirements and are significant.

While the project proponent may be able to mitigate for a significant impact to library facilities by paying a fee to buy more books, and to fire services by funding a fire station in the area, the impacts to traffic, schools, water supply and sewer services may not be easily mitigated.

For example, the project is currently not located in a Sanitation District, although the DEIR fails to make that clear until the last sentence in the discussion of waste water impacts⁴. This will require annexation to the Sanitation District, according to a letter submitted in reply to the NOP by the LA County Sanitation District on 11-8-04. The 2004 DMS analysis for this project states that impacts to sewer service will be significant, while the DEIR says it will be less than significant. The County must rely on the analysis of its service provider, the County Sanitation Districts, not the developer, who obviously has an interest in getting his project approved.

Interestingly, in spite of these awkward and obvious problems, the DEIR either omits to discuss or finds the project to be consistent with all policies of the General Plan. **Thus, this DEIR fails as an information document.**

Water Supply

The project proponent claims that he does not need to re-evaluate water supply because: “The Project's associated water demand was included by SCWD in the water demand projections contained in the 2005 UWMP (see Table 2-3 in the 2005 UWMP) and, therefore, under SB 610 (Water Code section 10910(c)(2)» the development is considered accounted for in the most recently adopted urban water management plan.”⁵

The 2008 Water Supply Assessment (WSA) for the project does not include the recent Federal Court decisions and Biological Opinions that have reduced pumping from the

³ DEIR, Appendix A, Fire Dept. letter dated 12-21-04

⁴ DEIR p.4.J-4

⁵ DEIR, page

Sacramento Delta⁶, and thus reduced water availability to the SWP. A new Water Supply Assessment that includes the impact of reduced pumping required by these decisions must be included in the review of this project to determine whether the water supply is adequate to support the project.

Cont'd

As the County is undoubtedly aware, State Water Supply was reduced to 5% of allotment last year and is currently at only 15% of allotment this year (see attached Notice to State Water Contractors). No article 21 water has been available for purchase and no excess water has been available for storage for several years. CLWA's storage contracts will expire in the next few years with the water is used or not. (See attached contract). The Planning Department should also note that CLWA does not have priority delivery rights on its contracts and was forced to buy a delivery right from Newhall Land and Farming last year in order to access its stored water. This is a precarious and expensive situation.

Should cutbacks of state water supply continue, the only source of sufficient ground water is in the western end of the Santa Clarita Valley⁷. The Santa Clara River is not adjudicated, so this water is available to the project, however extensive piping and pumps must be installed to make it available to locations in the eastern portion of the Santa Clarita Valley.

Water in the western reaches of the Santa Clara River is currently also being considered for use by Newhall Ranch. Both projects cannot be supported by this water supply. A cumulative updated analysis of this new information must be conducted as required by CEQA and the SB610 to ensure an adequate water supply.

Ammonium Perchlorate Pollution

In 1997 ammonium perchlorate contamination was discovered in the Saugus and alluvial aquifers of the Santa Clarita Valley. Since that time, six municipal drinking water wells have been closed down⁸, some of them permanently. Since the Saugus Aquifer is the drinking water supply long depended on in Santa Clarita as the emergency drought back up as well as a major source of daily supply, its contamination has been a blow to the reliability of local water supplies.

Ammonium perchlorate pollution affects the function of the thyroid gland causing hypothyroidism. Reduced thyroid function in pregnant women may cause retardation in the fetus.

In 2000 the Castaic Lake Water Agency (CLWA) and other local purveyors filed litigation against the Whittiker Bermite project to force them to clean up the water supply or pay for the clean up. Several years later a settlement agreement was reached that provided for funding to clean up two of the Saugus wells polluted by this contamination and one of the Alluvial wells.

⁶ *Natural Resources Defense Council v Kempthorne*, 506 F.Supp.2d 322 (E.D. Cal. 2007) (*Wanger Decision - Delta smelt*); and *Pacific Coast Federation of Fishermen's Associations, et al. v. Gutierrez, et al.*, No. 06-CV-00245-OWW-GSA (E.D. Cal. 2008) (*Wanger Decision - Chinook salmon/steelhead*).

⁷ Groundwater Basin Yield, 2008, Ludhdroff and Scalmanini and GSI Solutions, Inc., 2009, hereby included by reference in this administrative record.

⁸ Stadium Well, Valencia Well Q2, Valencia Well 157, Saugus 1 and 2, NCWD 11

In 2004, the Sierra Club and Friends of the Santa Clara River won an appellate court decision requiring disclosure of the ammonium perchlorate pollution and requiring a time line for the clean up in CLWA's Urban Water Management Plan⁹.

Since 2004, CLWA has repeatedly stated that the clean up facilities will be functioning "next year". They provided a timeline to comply with the Court Decision referenced above, but it is continually revised into the future. (See attached examples).

Cont'd

In addition to these delays, it was previously represented that the two wells designated to provide "capture" and clean up of the ammonium perchlorate (Saugus Well 1 and 2) would be returned to their previous production levels. However, CLWA found that production was significantly reduced by 50% in those two wells by the clean up process.¹⁰ This supply reduction was not anticipated and is not indicated in CLWA's 2005 Urban Water Management Plan or the 2008 Water Supply Assessment for this project.

We concur with the Sierra Club and others in stating that additional housing units should not be approved until these facilities are actually providing water to the community. These facilities are still not operating as of the date of this letter.

Further, there are no wells in the Saugus Aquifer to pump the water supplies listed as back up for drought years. To our knowledge, there are no studies to indicate that that water is really even available.

Castaic Lake Water Agency wholly owns the Santa Clarita Water Co. It is in the interests of CLWA to promote projects that will buy additional state water project water from CLWA, the state water wholesaler for the Santa Clarita Valley. This fact creates a conflict of interest. We believe an independent source should provide the water supply information for this company's projects in order to ensure their accuracy. All agencies should carefully review the water supply information for errors or omissions.

SCOPE concurs with others that a monopoly control that does not separate the retailer from the wholesaler of water supply may create serious problems for our community. The potential unwanted outcome may lead to poor planning, direction of water resources to only certain projects or water hoarding that impedes communities in their efforts to fairly distribute this precious resource. Such serious ethical issues should be held in mind as this project is reviewed and addressed by the decision-makers.

While we do not believe that his project should be approved without additional review of water resources, any approval should include the following mitigation in addition to other County requirements:

1. Full compliance with the State Landscape Ordinance
2. Compliance with the County's Green building ordinance.
3. A drain pipe/cistern collection system to provide ground water re-charge

⁹ *Friends of the Santa Clara River v. Castaic Lake Water Agency et al.*, 2004, CalAp5

¹⁰ See attached chart of Saugus Well Production Chart

4. A street storm water run off system designed to channel water back into landscaping
5. Open pavers in parking areas

Cont'd

Sewer Facilities

This project is not in a County Sanitation District. No sewer facilities are anywhere near it, and no pipes exist to service the project. The Saugus treatment plant is at capacity, so all sewage must go to the Valencia Plant and comply with the recent Chloride TMDL developed by the Regional Water Quality Control Board. There is no discussion of this serious problem in the DEIR.

The cost of a “package” sewer plant or the required sewer pipeline expansions to service this project may make the project cost prohibitive. Therefore, bonding should be required to ensure that this infrastructure can be built before grading and building permits are issued.

Air Quality/Climate Change

The Santa Clarita Valley is in a Federal non-attainment zone for ozone pollution and PM2 (particulate matter) pollution. Since this project will require over-riding considerations for approval, all available mitigation to reduce climate change and air pollution must be required. Projects may not be approved without requiring all available mitigation to reduce significant effects. We have attached the list of global warming mitigation produced by the AG’s office and ask that you incorporate all feasible mitigation as required by law.

Thank you for your time.

Sincerely,



Dave Lutness
Board Secretary

Attachments:

- 1.Saugus Well Production Chart from information provided by Castaic Lake Water Agency
2. Various Completion Timelines for the Perchlorate clean up facility.
3. Notice to Contractors of State Water Availability
4. List of Mitigation for global warming from the Attorney General’s Office

Exhibit

10

Saugus Formation Wells Actions

Well	Lost Capacity (gpm)	Action Taken	Restored Capacity (gpm)
V-157	1,500	Replaced with Well V-206	1,500
NC-11	1,200	Taken out of service	0
Saugus 1	2,600	Rehabilitate well; install treatment	1,200
Saugus 2	2,600	Rehabilitate well; install treatment	1,200
Total	7,900		3,900

Exhibit

2



Castaic Lake Water Agency

Memorandum

February 16, 2007

To: CLWA Planning and Engineering Committee

From: William J. Manetta *WJM*
Acting Engineering and Operations Manager

Subject: Perchlorate Remediation Program

SUMMARY

Work continues on multiple tasks to address the groundwater contamination stemming from past manufacturing activities on the Whittaker-Bermite site. The Agency and purveyors are proceeding to restore the production capacity of the groundwater supply wells contaminated by perchlorate, while working on the objectives of containing the downgradient migration of perchlorate and recovering costs incurred in responding to the perchlorate contamination. (*Goal 2.1.5: Treat 2,400 gallons per minute of water from the Saugus Formation that is contaminated with perchlorate and restore to potable water service. Goal 2.1.6: Develop replacement wells for capacity lost due to perchlorate contamination.*)

DISCUSSION

The Agency has authorized Black & Veatch (B&V), Carollo Engineers (CE) and Kennedy/Jenks Consultants (K/J) to assist in providing services to respond to the various tasks associated with the Perchlorate Remediation Program. The following table provides a status report on the activities and tasks:

Task Group	Tasks	Consultant	Status
Settlement Activities	Project Description	K/J	Complete.
	Final Settlement	K/J, Nossaman	Negotiations ongoing.
DTSC Approval Activities	Remedial Investigation (RI)	K/J	DTSC approved 8/16/05.
	Feasibility Study (FS)	K/J	DTSC approved 8/16/05.
	Draft Remedial Action Plan (RAP)	K/J	DTSC approved 8/16/05.
	Final RAP	K/J	Public Hearing held 9/7/05. DTSC approved 1/20/06.
U.S. Army Corps of Engineers Feasibility Phase Study	Conceptual Hydrogeology Technical Memorandum	CH2MHill	Final distributed 1/19/05. Progress report with model construction calibration distributed 10/11/05.
U.S. Army Corps of Engineers Feasibility Phase Study	Monitoring	CH2MHill	Federal FY 2005 funding provides for limited monitoring of existing test wells and testing of NCWD NC13 Southern Saugus well. Completed 6/14/06.

Task Group	Tasks	Consultant	Status
DHS Approval Activities (97-005)	Source Water Assessment	B&V, CE	Received comments on revised document from DHS 4/27/06.
	Water Quality Investigation	B&V, CE	Received comments on revised document from DHS 4/27/06.
	Source Protection Plan	B&V	Received comments on revised document from DHS 4/27/06.
	Effective Monitoring and Treatment	B&V, CE, CH2MHill	Received comments on revised document from DHS 4/27/06.
	Human Health Risk	B&V	Received comments on revised document from DHS 4/27/06.
	Alternatives Evaluation	B&V, CE	Received comments on revised document from DHS 5/10/06. Revised document will be returned to DHS with Engineer's Report.
	Engineers Report	B&V	Responded 12/19/06 to DHS comments received 12/1/06 on Final Draft submitted to DHS 10/27/06.
	CEQA	B&V	Mitigated Negative Declaration certified 9/14/05.
	Permit Application	B&V	Pending design completion.
	Public Hearing	B&V	Pending design completion.
	DHS Evaluation & Permit	B&V	Pending design completion.
Implementation Activities	Easements and Right of Way	K/J	Alignment studies complete 8/08/05. Document preparation in progress.
	Treatment Design	K/J	Scheduled design completion 3/07.
	Pipeline Design	K/J	Scheduled design completion 3/07.
	Construction	K/J	Plan to start 6/07.
	Startup and Monitoring	K/J	Scheduled 6/08.

The City of Santa Clarita's Multi-Jurisdictional Task Force and Citizens Advisory Group meetings will be held on February 28, 2007. The bi-monthly DTSC meeting was held on January 31, 2007. The next DTSC meeting will be held on April 17, 2007.

FINANCIAL STATUS

Settlement negotiations are ongoing with the purveyors, Whittaker-Bermite and insurance carriers.

JRL

Handwritten signature/initials



Castaic Lake Water Agency

Memorandum

ITEM NO. 9

November 22, 2005

To: CLWA Planning and Engineering Committee
From: Ken Petersen
Engineering and Operations Manager *kp*
Subject: Perchlorate Remediation Program

SUMMARY

Work continues on multiple tasks to address the perchlorate contamination of portions of the local aquifers, stemming from past manufacturing activities on the Whittaker-Bermite site. The Agency and purveyors are proceeding to restore the production capacity of the groundwater supply wells contaminated by perchlorate, while working on the objectives of containing the downgradient migration of perchlorate and recovering costs incurred in responding to the perchlorate contamination.

DISCUSSION

The Agency has authorized Black & Veatch (B&V), Carollo Engineers (CE) and Kennedy/Jenks Consultants (K/J) to assist in providing services to respond to the various tasks associated with the Perchlorate Remediation Program. The following table provides a status report on the activities and tasks:

Task Group	Tasks	Consultant	Status
Settlement Activities	Project Description	K/J	Complete.
	Final Settlement	K/J, Nossaman	Negotiations ongoing.
DTSC Approval Activities	Remedial Investigation (RI)	K/J	DTSC Approved 8/16/2005.
	Feasibility Study (FS)	K/J	DTSC Approved 8/16/2005.
	Draft Remedial Action Plan (RAP)	K/J	DTSC Approved 8/16/2005.
	Final RAP	K/J	Public Hearing held 9/7/05. DTSC responding to comments.
U.S. Army Corps of Engineers Feasibility Phase Study	Conceptual Hydrogeology . Technical Memorandum	CH2MHILL	Final distributed 1/19/2005. Progress report with model construction calibration distributed 10/11/2005.

Task Group	Tasks	Consultant	Status
U.S. Army Corps of Engineers Feasibility Phase Study	Monitoring	CH2MHILL	FY 2005 funding provides for limited monitoring of existing test wells.
DHS Approval Activities (97-005)	Source Water Assessment	B&V, CE	Received comments from DHS 5/17/2005.
	Water Quality Investigation	B&V, CE	Received comments from DHS 5/17/2005.
	Source Protection Plan	B&V	Received comments from DHS 5/17/2005.
	Effective Monitoring and Treatment	B&V, CE, CH2MHILL	Received comments from DHS 8/15/2005.
	Human Health Risk	B&V	Draft completed. Awaiting comments from DHS.
	Alternatives Evaluation	B&V, CE	Draft completed. Awaiting comments from DHS.
	CEQA	B&V	Mitigated Negative Declaration certified 9/14/2005.
	Permit Application	B&V	Pending design completion.
	Public Hearing	B&V	Pending design completion.
	DHS Evaluation & Permit	B&V	Pending design completion.
Implementation Activities	Easements and Right of Way	K/J	Alignment studies complete.
	Treatment Design	K/J	Scheduled design completion 2/06.
	Pipeline Design	K/J	Alignment studies complete.
	Construction	K/J	Plan to start 2/06.
	Startup and Monitoring	K/J	Scheduled 10/06.

Work in Progress:

Maintenance of air release vacuum valves and pump-outs throughout the distribution system continues.

Planned Actions:

Electrical switch gear preventive maintenance and testing at all facilities. Ozone generator cooling water closed loop system installation.

PERCHLORATE CONTAMINATION PROGRAM MANAGEMENT

(FY 2008/09 Action A4.2: Complete construction of the Groundwater Production Restoration Project; Action A4.3: Complete construction and startup of the Perchlorate Treatment Project; Action A4.5: Develop replacement wells for capacity lost due to perchlorate contamination.)

SUMMARY

Work continues on multiple tasks to address the groundwater contamination stemming from past manufacturing activities on the Whittaker-Bermite site. The Agency and purveyors are proceeding to restore the production capacity of the groundwater supply wells contaminated by perchlorate, while working on the objectives of containing the downgradient migration of perchlorate and recovering costs incurred in responding to the perchlorate contamination.

PERCHLORATE CONTAMINATION PROGRAM MANAGEMENT

The following table provides a status report on the activities and tasks:

Task Group	Tasks	Consultant	Status
Settlement Activities	Project Description	K/J	Complete.
	Final Settlement	K/J, Nossaman	Settlement agreement took effect on 7/13/07 with U.S. District Court approval.
DTSC Approval Activities	Remedial Investigation (RI)	K/J	DTSC approved 8/16/05.
	Feasibility Study (FS)	K/J	DTSC approved 8/16/05.
	Final Remedial Action Plan	K/J	Public hearing held 9/7/05. DTSC approved 1/20/06.
U.S. Army Corps of Engineers Feasibility Phase Study	Conceptual Hydrogeology Technical Memorandum	CH2MHill	Final distributed 1/19/05. Progress report with model construction calibration distributed 10/11/05.
DPH Approval Activities (97-005)	Source Water Assessment	B&V, CE	Received comments on revised document from DPH 4/27/06.
	Effective Monitoring and Treatment	B&V, CE, CH2MHill	Received comments on revised document from DPH 4/27/06.
	Water Quality Investigation	B&V, CE	Received comments on revised document from DPH 4/27/06.

PERCHLORATE CONTAMINATION PROGRAM MANAGEMENT (Continued from previous page...)

Task Group	Tasks	Consultant	Status
	Human Health Risk	B&V	Received comments on revised document from DPH 4/27/06.
DPH Approval Activities (97-005)	Source Protection Plan	B&V	Received comments on revised document from DPH 4/27/06.
	Alternatives Evaluation	B&V, CE	Received comments on revised document from DPH 5/10/06. Revised document will be returned to DPH with Engineer's Report.
	Engineers Report	B&V	Final submitted to DPH 1/29/09.
	CEQA	B&V	Mitigated Negative Declaration certified 9/14/05.
	Operations and Maintenance Report	K/J	Preparation of report by K/J is ongoing.
	Permit Application	B&V	Awaiting response from DPH.
	Public Hearing	B&V	Awaiting response from DPH.
	DPH Evaluation and Permit	B&V	Awaiting response from DPH.
Implementation Activities	Easements and Right of Way	K/J	Easement and right-of-way acquisition completed 1/08.
	Treatment Project	K/J	Project is 94% complete.
	Pipeline Project	K/J	Project is 81% complete.
	Well Rehabilitation	SCP/GPC	General Pump completed the rehabilitation work on 2/3/09 and installed the new pumps.
	Start-up and Monitoring	K/J	Scheduled summer 2009.
	Sentinel Wells	Environ	Wells have been installed. Disposal of investigation derived wastes awaits results of laboratory analyses.

The monthly Technical Committee Meeting was held on June 10, 2009. The next Technical Committee Meeting is scheduled for July 14, 2009. The next Whittaker-Bermite Multi-Jurisdictional Task Force meeting is scheduled for July 8, 2009.

FINANCIAL STATUS

The Settlement Agreement among CLWA, the purveyors, Whittaker-Bermite and insurance carriers is in effect. Reimbursements requests have been submitted and have been made for most expenses through March 31, 2009.



Castaic Lake Water Agency Memorandum

February 2, 2010

To: CLWA Board of Directors
From: Brian J. Folsom *BJF*
Engineering and Operations Manager
Subject: Engineering and Operations Department Report

TREATMENT PLANT OPERATIONS AND MAINTENANCE

Completed Work:

Deliveries to the purveyors in January totaled 1,681 acre-feet (AF), for an average daily flow rate of 17.67 million gallons per day (MGD). January 2010 deliveries were 3.6% below January 2009 deliveries. The fiscal-year-to-date (FYTD) deliveries for FY 2009/10 are 24,786 AF, which is 1% above FYTD 2008/09. Monthly flows for 2007, 2008, 2009 and 2010 are presented in the attached table. (FY 2009/10 Action A1.1: Meet all purveyor water demands and Action B3.9: Meet all applicable water quality regulations.)

In early 2009 staff worked with a consultant, Utilities Cost Management (UCM), to analyze the Agency's accounts with Southern California Edison (SCE) and determine if changes in the SCE rates assigned to the Agency's accounts would result in reduced electrical costs. Changes were made to five accounts and the Agency realized a savings of \$69,242.36 during 2009. FYTD electrical use for FY 2009/10 at the Agency's major facilities is shown in the attached "Energy Usage at Major Facilities" table and equals 7,155,556 kWh at a total cost of \$787,175.33.

Inspection and maintenance activities during January included cleaning wash water return basins, chemical feed pump monthly maintenance, on-line analyzer maintenance, inspection of the 102" raw water line, and switch gear cleaning.

Distribution system maintenance activities during January included preventive maintenance on air release and vacuum valves and pump-outs, and exercising of valves.

Inspector Activities

Rio Vista Water Treatment Plant Expansion: Inspected soil borings, located underground facilities and collected GPS coordinates of existing utilities throughout jobsite.

Completed 30 dig alerts.

Work in Progress:

Maintenance of air release and vacuum valves and pump-outs throughout the distribution system continues. Fabrication of clarifier screens at RVWTP and security lighting upgrades continue. Instrumentation staff continue to work with the contractor on the Wonderware SCADA conversion and PLC upgrade.

Planned Actions:

Perform repairs on the plant water tank at Rio Vista Water Treatment Plant. Perform efficiency testing on all ozone generators.

PERCHLORATE CONTAMINATION PROGRAM MANAGEMENT

(FY 2009/10 Action A4.1: Complete construction of the Groundwater Production Restoration Project; Action A4.2: Complete construction and startup of the Perchlorate Treatment Project; Action A4.8: Develop replacement wells for capacity lost due to perchlorate contamination.)

SUMMARY

Work continues on multiple tasks to address the groundwater contamination stemming from past manufacturing activities on the Whittaker-Bermite site. The Agency and purveyors are proceeding to restore the production capacity of the groundwater supply wells contaminated by perchlorate, while working on the objectives of containing the downgradient migration of perchlorate and recovering costs incurred in responding to the perchlorate contamination.

PERCHLORATE CONTAMINATION PROGRAM MANAGEMENT

The following table provides a status report on the activities and tasks:

Task Group	Tasks	Consultant	Status
Settlement Activities	Project Description	K/J	Complete.
	Final Settlement	K/J, Nossaman	Settlement agreement took effect on 7/13/07 with U.S. District Court approval.
DTSC Approval Activities	Remedial Investigation (RI)	K/J	DTSC approved 8/16/05.
	Feasibility Study (FS)	K/J	DTSC approved 8/16/05.
	Final Remedial Action Plan	K/J	Public hearing held 9/7/05. DTSC approved 1/20/06.
U.S. Army Corps of Engineers Feasibility Phase Study	Conceptual Hydrogeology Technical Memorandum	CH2MHill	Final distributed 1/19/05. Progress report with model construction calibration distributed 10/11/05.
DPH Approval Activities (97-005)	Source Water Assessment	B&V, CE	Received comments on revised document from DPH 4/27/06.
	Effective Monitoring and Treatment	B&V, CE, CH2MHill	Received comments on revised document from DPH 4/27/06.
	Water Quality Investigation	B&V, CE	Received comments on revised document from DPH 4/27/06.
	Human Health Risk	B&V	Received comments on revised document from DPH 4/27/06.
	Source Protection Plan	B&V	Received comments on revised document from DPH 4/27/06.

PERCHLORATE CONTAMINATION PROGRAM MANAGEMENT (Continued from previous page...)

Task Group	Tasks	Consultant	Status
	Alternatives Evaluation	B&V, CE	Received comments on revised document from DPH 5/10/06. Revised document will be returned to DPH with Engineer's Report.
DPH Approval Activities (97-005)	Engineers Report	B&V	Final submitted to DPH 1/29/09.
	CEQA	B&V	Mitigated Negative Declaration certified 9/14/05.
	Operations and Maintenance Report	K/J	Draft report submitted to DPH on 11/25/09.
	Permit Application	B&V	Submitted 12/10/09.
	Public Hearing	B&V	Will take place upon approval of all documents.
	DPH Evaluation and Permit	B&V	Awaiting response from DPH.
Implementation Activities	Easements and Right of Way	K/J	Easement and right-of-way acquisition completed 1/08.
	Treatment Project	K/J	Project is 99+% complete.
	Pipeline Project	K/J	Project is 99+% complete.
	Well Rehabilitation	SCP/GPC	General Pump completed the rehabilitation work on 2/3/09 and installed the new pumps.
	Start-up and Monitoring	K/J	Scheduled 2/10.
	Sentinel Wells	Environ	Wells have been installed. Disposal of investigation derived wastes awaits results of laboratory analyses.

The monthly Technical Committee Meeting was held on January 13, 2010. The next Technical Committee Meeting is scheduled for February 9, 2010. The next Whittaker-Bermite Multi-Jurisdictional Task Force meeting is scheduled for March 24, 2010.

FINANCIAL STATUS

The Settlement Agreement among CLWA, the purveyors, Whittaker-Bermite and insurance carriers is in effect. Reimbursement requests have been submitted and payments have been made for expenses through November 30, 2009.

Exhibit

3

**NOTICE TO STATE WATER PROJECT CONTRACTORS****Number:** 10-03**Date:** FEB 23 2010**Subject:** 2010 State Water Project Allocation Increase to 15 Percent**From:** *for* Raphael A. Torres *Robert B. Cooke*
Deputy Director, DEPARTMENT OF WATER RESOURCES

The Department of Water Resources (DWR) is increasing the allocation of 2010 State Water Project (SWP) water for long-term contractors from 208,597 acre-feet to 625,798 acre-feet. Based on recent precipitation and current water supply conditions, SWP supplies are projected to meet 15 percent of most SWP Contractors' 2010 requested Table A amounts, which total 4,171,996 acre-feet. Attached is the revised 2010 SWP allocation table.

DWR's new approval considered several factors including existing storage in SWP conservation reservoirs; SWP operational constraints such as the conditions of the recent Biological Opinions for delta smelt and salmonids and the incidental take permit for longfin smelt; and 2010 contractor demands. DWR may revise allocations if warranted by the year's developing hydrologic and water supply conditions.

If you have any questions or need additional information, please contact Robert Cooke, Chief of DWR's State Water Project Analysis Office, at (916) 653-4313.

Attachment

**2010 STATE WATER PROJECT ALLOCATION
(ACRE-FEET)**

SWP CONTRACTORS	TABLE A (1)	INITIAL REQUEST (2)	APPROVED ALLOCATION (3)	PERCENT INITIAL REQUEST APPROVED (3)/(2) (4)
<u>FEATHER RIVER</u>				
County of Butte	27,500	27,500	4,125	15%
Plumas County FC&WCD	2,160	2,160	324	15%
City of Yuba City	9,600	9,600	1,440	15%
Subtotal	39,260	39,260	5,889	
<u>NORTH BAY</u>				
Napa County FC&WCD	29,025	29,025	4,354	15%
Solano County WA	47,506	47,506	7,126	15%
Subtotal	76,531	76,531	11,480	
<u>SOUTH BAY</u>				
Alameda County FC&WCD, Zone 7	80,619	80,619	12,093	15%
Alameda County WD	42,000	42,000	6,300	15%
Santa Clara Valley WD	100,000	100,000	15,000	15%
Subtotal	222,619	222,619	33,393	
<u>SAN JOAQUIN VALLEY</u>				
Oak Flat WD	5,700	5,700	855	15%
County of Kings	9,305	9,305	1,396	15%
Dudley Ridge WD	50,343	50,343	7,551	15%
Empire West Side ID	3,000	3,000	450	15%
Kern County WA	982,730	982,730	147,409	15%
Tulare Lake Basin WSD	88,922	88,922	13,338	15%
Subtotal	1,140,000	1,140,000	170,999	
<u>CENTRAL COASTAL</u>				
San Luis Obispo County FC&WCD	25,000	25,000	3,750	15%
Santa Barbara County FC&WCD	45,486	45,486	6,823	15%
Subtotal	70,486	70,486	10,573	
<u>SOUTHERN CALIFORNIA</u>				
Antelope Valley-East Kern WA	141,400	141,400	21,210	15%
Castaic Lake WA	95,200	95,200	14,280	15%
Coachella Valley WD	138,350	138,350	20,752	15%
Crestline-Lake Arrowhead WA	5,800	5,800	870	15%
Desert WA	55,750	55,750	8,362	15%
Littlerock Creek ID	2,300	2,300	345	15%
Mojave WA	82,800	82,800	12,420	15%
Metropolitan WDSC	1,911,500	1,911,500	286,725	15%
Palmdale WD	21,300	21,300	3,195	15%
San Bernardino Valley MWD	102,600	102,600	15,390	15%
San Gabriel Valley MWD	28,800	28,800	4,320	15%
San Geronio Pass WA	17,300	17,300	2,595	15%
Ventura County FCD	20,000	20,000	3,000	15%
Subtotal	2,623,100	2,623,100	393,464	
TOTAL	4,171,996	4,171,996	625,798	

Exhibit

4

Notes Some pages are double sided

Mitigation Measures and Global Warming Resources
California Attorney General's Office

(1) Global Warming Mitigation Measures

The following are some examples of the types mitigation that local agencies may consider under the California Environmental Quality Act (CEQA) to offset or reduce global warming impacts. The list, which is by no means exhaustive or obligatory, includes measures and policies that could be undertaken directly by the local agency, incorporated into the agency's own "Climate Action Plan,"¹ or funded by "fair share" mitigation fees; measures that could be incorporated as a condition of approval of an individual project; and measures that may be outside the jurisdiction of the local agency to impose or require but still appropriate for consideration in an agency's environmental document.

While the lead agency must determine which particular mitigation measures, or suite of measures, is appropriate and feasible for a particular project, proponents of individual private projects are encouraged to take an active role in developing and presenting to lead agencies new and innovative ways to address the impacts of global warming.

Transportation

- Coordinate controlled intersections so that traffic passes more efficiently through congested areas.
- Set specific limits on idling time for commercial vehicles, including delivery and construction vehicles.
- Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, designating adequate passenger loading and unloading and waiting areas, and providing electronic message board space for coordinating rides.
- Create car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.²
- Create and/or expand existing vehicle buy-back programs to include vehicles with high greenhouse gas emissions.
- Require clean alternative fuels and electric vehicles.
- Develop the necessary infrastructure to encourage the use of alternative fuel vehicles (e.g., electric vehicle charging facilities and conveniently located alternative fueling stations).³
- Increase the cost of driving and parking private vehicles by imposing tolls, parking fees, and residential parking permit limits.

water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.) Offer financial incentives for adoption of identified efficiency measures.¹³

- Provide individualized energy management services for large energy users.
- Require the use of energy efficient heating and cooling systems, appliances and office equipment.¹⁴
- Fund incentives and technical assistance for lighting efficiency.¹⁵
- Require that projects use efficient lighting. (Fluorescent lighting uses approximately 75% less energy than incandescent lighting to deliver the same amount of light.)
- Require the use of Light Emitting Diode (LED) for traffic and street lighting.¹⁶
- Incorporate on-site renewable energy production (through, *e.g.*, participation in the California Energy Commission's New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.¹⁷
- Streamline permitting and provide public information to facilitate accelerated construction of solar and wind power systems, solar and tankless hot water heaters, and energy-efficient heating, ventilation and air conditioning systems in existing buildings.¹⁸
- Provide innovative financing for energy efficiency and alternative energy projects. For example, allow property owners to pay for energy efficiency improvements and solar system installation through long-term assessments on individual property tax bills.¹⁹
- Fund incentives to encourage the use of energy efficient equipment and vehicles.
- Provide public education and publicity about energy efficiency and available programs and incentives.²⁰

Land Use Measures

- Encourage mixed-use, infill, and higher density development to reduce vehicle trips, promote alternatives to individual vehicle travel and promote efficient delivery of services and goods. Infill development generates fewer vehicle miles traveled (VMT) per capita and reduced emissions of greenhouse gases, and denser development is associated with increased public transit use.²¹ For example, a city or county could promote "smart" development by reducing developer fees or granting property tax credits for qualifying projects.²²
- Discourage development that will increase passenger vehicle VMT. Enact ordinances and programs to limit or prohibit sprawl – development that requires additional or longer passenger vehicle commutes between workplaces and residences.²³
- Incorporate public transit into project design.²⁴

- Require measures that take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Preserve and create open space and parks. Preserve existing trees and require the planting of replacement trees for those removed in construction.
- Impose measures to address this “urban heat island” effect by, *e.g.*, requiring light-colored and reflective roofing materials and paint; light-colored roads and parking lots; shade trees in parking lots; and shade trees on the south and west sides of new or renovated buildings.²⁵ Darker colored roofs, pavement, and lack of trees may cause temperatures in urban environments to increase by as much as 6-8 degrees Fahrenheit as compared to surrounding areas.²⁶
- Facilitate “brownfield” development located near existing public transportation and jobs.
- Require pedestrian-only streets and plazas within developments, and destinations that may be reached conveniently by public transportation, walking, or bicycling.²⁷

Water Conservation and Efficiency²⁸

- Design and implement a comprehensive water conservation strategy. The strategy may include many of the specific items that follow, plus other innovative measures that are appropriate for the location.
- Require water efficient landscapes.²⁹ Adopt a strong landscape ordinance with water budgets to assure efficient landscape design, installation, and maintenance in new construction.
- Encourage the use of reclaimed water for landscape irrigation in new developments and on public property. Provide necessary infrastructure to deliver and use reclaimed water.
- Require water efficient design for buildings. This may include strengthening local building codes for new construction and implementing a program to renovate existing buildings to require a higher level of water efficiency.
- Adopt a retrofit ordinance that will require installation of water-efficient fixtures upon the sale of homes.³⁰
- Adopt and enforce restrictions on watering methods (*e.g.*, prohibiting systems that apply water to non-vegetated surfaces) and controls on runoff.
- Require water efficiency training and certification for irrigation designers, installers and managers.
- Provide individualized water audits for large water users to identify conservation opportunities. Offer financial incentives for adoption of identified efficiency measures.
- Provide water audits for large landscape accounts. Offer financial incentives for efficient irrigation controls and other efficiency measures.
- Fund incentives and technical assistance for water efficiency.
- Adopt standards that prescribe the maximum allowable effective impervious area

for all new development and redevelopment projects. Require preservation of the existing hydrologic character of developed sites to manage storm water and protect the environment. (Retaining storm water runoff onsite can drastically reduce the need for energy-intensive imported water at the site.)

- Adopt conservation pricing to encourage efficient water use.³¹

Solid Waste Measures

- Require projects to reuse and recycle construction and demolition waste.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses.
- Increase areas served by recycling programs
- Extend the types of recycling services offered (*e.g.*, to include food and green waste recycling).
- Establish methane recovery in local landfills, wastewater treatment and animal operations plants to generate electricity.³²
- Provide public education and publicity about recycling services.

Carbon Offsets

- In some instances, a lead agency may find that measures that will directly reduce a project's emissions are insufficient. A lead agency may consider whether carbon offsets would be appropriate. The project proponent could, for example, fund off-site projects (*e.g.*, alternative energy projects) that will reduce carbon emissions, or could purchase "credits" from another entity that will fund such projects. The lead agency should ensure that any mitigation taking the form of carbon offsets is specifically identified and that such mitigation will in fact occur.

(2) General Resources

The following web sites and organizations provide general information about mitigating global warming impacts at the local level. These sites represent only a small fraction of the available resources. Local agencies are encouraged to conduct their own research in order to obtain the most current and relevant materials.

- The U.S. Conference of Mayors' Climate Protection Agreement contains valuable information for the many local agencies that are joining the fight against global warming. The Agreement is available here:
http://www.coolcities.us/resources/bestPracticeGuides/USM_ClimateActionHB.pdf.
Nearly one hundred California cities have joined the "Cool Cities" campaign, which means they have signed the U.S. Mayor' Climate Protection Agreement and are taking concrete steps toward addressing global warming. These steps include preparing a city-wide greenhouse gas emissions inventory and creating and implementing a local Climate

3. See the City of Santa Monica's Green Building Program at <http://www.greenbuildings.santa-monica.org/transportation/parkingcharging.html>.
4. San Francisco's "Transit First" Policy is listed in its Climate Action Plan, available at <http://www.sfenvironment.org/downloads/library/climateactionplan.pdf>.
5. San Francisco assesses a Downtown Transportation Impact Fee on new office construction and commercial office space renovation within a designated district. The fee is discussed in the City's Climate Action plan. See Note 4.
6. See Marin County's Safe Routes to Schools program at <http://www.saferoutestoschools.org/>.
7. The City of La Mesa has a Sidewalk Master Plan and an associated map that the City uses to prioritize funding. As the City states, "The most important concept for sidewalks is connectivity. For people to want to use a sidewalk, it must conveniently connect them to their intended destination." See <http://www.ci.la-mesa.ca.us/index.asp?NID=699>.
8. The U.S. Conference of Mayors' Climate Action Handbook, cited above, lists education and outreach as key components to taking action against global warming.
9. Leadership in Energy and Environmental Design (LEED) administers a Green Building Ratings program that provides benchmarks for the design, construction, and operation of high-performance green buildings. More information about the LEED ratings system is available at <http://www.usgbc.org/DisplayPage.aspx?CategoryID=19>. Build it Green is a non-profit, membership organization that promotes green building practices in California. The organization offers a point-based, green building rating system for various types of projects. See <http://www.builditgreen.org/guidelines-rating-systems>.
10. Public Resources Code Section 25402.1(h)2 and Section 10-106 of the Building Energy Efficiency Standards establish a process which allows local adoption of energy standards that are more stringent than the statewide Standards. More information is available at the California Energy Commission's website. See http://www.energy.ca.gov/title24/2005standards/ordinances_exceeding_2005_building_standards.html.
11. The City of Santa Monica, for example, has instituted a Green Building Program. See Note 4 and <http://www.greenbuildings.santa-monica.org/>. The City of Pasadena also has a green building ordinance that applies to public and private buildings. See <http://www.ci.pasadena.ca.us/permitcenter/greencity/building/gbprogram.asp> and http://ordlink.com/codes/pasadena/index.htm?Search_Code=Begin+Searching+Municipal+Code. The City of San Francisco is considering adopting green building performance requirements that would apply to public and private buildings. See <http://www.sfenvironment.org/downloads/library/gbtfrrreleasev1.3.pdf>.

21. See US EPA, Our Built and Natural Environments, A Technical Review of the Interactions between Land Use, Transportation, and Environmental Quality (Jan. 2001) at pp. 46-48 <http://www.epa.gov/dced/pdf/built.pdf>.
22. The City of Berkeley has endorsed this strategy in its Resource Conservation and Global Warming Abatement Plan. See Note 16.
23. Samples of local legislation to reduce sprawl are set forth in the U.S. Conference of Mayors' Climate Action Handbook, cited above.
24. The U.S. Conference of Mayors cites Sacramento's Transit Village Redevelopment as a model of transit-oriented development. More information about this project is available at <http://www.cityofsacramento.org/planning/projects/65th-street-village/>.
25. See the website for Lawrence Berkeley National Laboratory's Urban Heat Island Group at <http://eetd.lbl.gov/HeatIsland/LEARN/> and U.S. EPA's Heat Island website at www.epa.gov/heatisland/. To learn about the effectiveness of various heat island mitigation strategies, see the Mitigation Impact Screening Tool, available at <http://www.epa.gov/heatisd/resources/tools.html>.
26. Some local agencies have implemented a cool surfaces programs in conjunction with measures to address storm water run off and water quality. See, for example, The City of Irvine's Sustainable Travelways/Green Streets program at http://www.cityofirvine.org/depts/redevelopment/sustainable_travelways.asp; The City of Los Angeles's Green Streets LA program at http://water.lgc.org/water-workshops/la-workshop/Green_Streets_Daniels.pdf/view; see also The Chicago Green Alley Handbook at http://egov.cityofchicago.org/webportal/COCWebPortal/COC_EDITORIAL/GreenAlleyHandbook_Jan.pdf.
27. Palo Alto's Green Ribbon Task Force Report on Climate Protection recommends pedestrian streets under its proposed actions. See <http://www.city.palo-alto.ca.us/knowzone/agendas/grtf.asp>.
28. The California Energy Commission has found that the State's water-related energy use – which includes the conveyance, storage, treatment, distribution, wastewater collection, treatment, and discharge – consumes about 19 percent of the State's electricity, 30 percent of its natural gas, and 88 billion gallons of diesel fuel every year, and this demand is growing. See <http://www.energy.ca.gov/2007publications/CEC-999-2007-008/CEC-999-2007-008.PDF>. Accordingly, reducing water use and improving water efficiency can help reduce energy use and associated greenhouse gas emissions.

29. The Water Conservation in Landscaping Act of 2006 (AB 1881) requires the Department of Water Resources (DWR), not later than January 1, 2009, to update the Model Water Efficient Landscape Ordinance. The draft of the entire updated Model Water Efficient Landscape Ordinance will be made available to the public in December 2007. See <http://www.owue.water.ca.gov/landscape/ord/updatedOrd.cfm>.
30. See the City of San Diego's plumbing retrofit ordinance at <http://www.sandiego.gov/water/conservation/selling.shtml>.
31. The Irvine Ranch Water District in Southern California uses a five-tiered rate structure that rewards conservation. The water district has a baseline charge for necessary water use. Water use that exceeds the baseline amount costs incrementally more money. While "low volume" water use costs \$.082 per hundred cubic feet (ccf), "wasteful" water use costs \$7.84 per ccf. See http://www.irwd.com/AboutIRWD/rates_residential.php.
32. San Diego's Metropolitan Wastewater Department installed eight "digesters" at one of its wastewater treatment plants. Digesters use heat and bacteria to break down the organic solids removed from the wastewater to create methane. See <http://www.sandiego.gov/mwwd/facilities/ptloma.shtml>.

LETTER NO. J2

David Lutness, Board Secretary
Santa Clarita Organization for Planning and the Environment
P.O. Box 1182
Santa Clarita, CA 91386

RESPONSE NO. J2-1

This comment letter was received by the County of Los Angeles Department of Regional Planning on March 3rd and later replaced with a near identical version on March 7th. The letter is considered a part of the record of comments submitted on the Final EIR. Although the California Environmental Quality Act (CEQA) does not require that responses be provided to comments on the Final EIR, responses to the comments in the letter are provided below.

RESPONSE NO. J2-2

Copies of the Final EIR with responses to comments on the Draft EIR were provided to all agencies, organizations and individuals who provided comments on the Draft EIR. At the Regional Planning Commission hearing held on December 16, 2009, the hearing was continued to March 3, 2010, to allow the applicant to clear the remaining technical holds on the project related to proof of off-site easements for grading and access, as well as approval of a proposed booster station. The County is not aware of any statements made at the hearing that the general plan amendment proposed by the project would be reviewed after the update to the Santa Clarita Area Plan update.

RESPONSE NO. J2-3

As further described in Response H1-10 and H1-11 in Volume I of the Skyline Ranch Final EIR, the plan amendment being proposed as part of the project was added to the list of entitlements being requested because there was a delay in the process to update the Santa Clarita Area Plan (SCAP), a process that has been underway for almost 10 years. Project consistency with the adopted Santa Clarita Area Plan is addressed in Section 4.Q, Land Use of the Skyline Ranch Draft EIR. The statement that the proposed project does not fit the vision of the SCAP because it does not promote high density near a transportation node is not clear. As a single-family residential development, the project is not high density and does not conflict with goals for locating high density projects near transportation nodes. Furthermore, the proposed development site for this single-family residential project is located adjacent to existing single-family residential development in the City of Santa Clarita along the western edge of the site. And finally, the zoning proposed for

the site under the pending SCAP update is for residential uses, with the potential for development of approximately 1,700 dwelling units, which does not conflict with the 1,260 residential lots, recreation, school and open space uses proposed by the project.

RESPONSE NO. J2-4

Traffic impacts and effects on public transportation are evaluated in Section 4.F, Traffic/Access of the Skyline Ranch Draft EIR. The statement that Skyline Ranch is not located near any transportation source is in error. As discussed in detail on page 4.F-12 and 4.F-13, under the heading Existing Transit Service, there are three bus service lines within a quarter mile of the site. Furthermore, as stated on page 4.F-38, with development of the project, Santa Clarita Transit would be able to utilize Skyline Ranch Road as part of future bus route changes. Regarding the statement that the project would add congestion to local roadways, the projects impacts on these roadways have been disclosed and evaluated in conformance with appropriate County practices and methodology with mitigation measures provided to address identified significant impacts in compliance with CEQA. Regarding the County Development Monitoring System (DMS) and exceedence of traffic levels, the DMS is not a traffic forecasting tool. For traffic forecasting in the project area, the County relies on the Santa Clarita Valley Consolidated Traffic Model (SCVCTM), which is a sophisticated travel demand model maintained jointly by the County of Los Angeles Department of Public Works and the City of Santa Clarita Transportation Division. DMS data is one of multiple sources that are used to update and maintain the detailed land use database that is utilized by the SCVCTM for the purpose of forecasting traffic volumes. This data was used at multiple points as a partial basis for assessing traffic impacts for the EIR.

RESPONSE NO. J2-5

See Response H1-11 in Volume I of the Final EIR. In summary the Draft EIR did address the extension of Skyline Ranch Road as an amendment to the current County Highway Plan being recommended and proposed as part of the County General Plan update. While this improvement is now being included as part of the approvals being sought by the project due to delays in the approval of the SCAP, the roadway is consistent with the County's recommendations in the Draft Highway Plan and it has been fully analyzed in the Draft EIR. By way of background, the County has been studying this alignment change for almost six years and it was approved by the County Department of Public Works as a preferred alignment for the Draft Highway Plan in July 2006. Furthermore, regarding the statement that the EIR has not served as an informational document because it has not discussed the fact that the project is now proposing the amendment is in error. This issue has been appropriately disclosed and discussed in the Skyline Ranch Final EIR.

RESPONSE NO. J2-6

A fundamental purpose of the Notice of Preparation is to identify issues that require further analysis in an EIR. While it is correct that the Initial Study attached to the Notice of Preparation for the project indicated that a zone change might be required, this issue was further evaluated by staff and analyzed in the EIR. As discussed in Section 4.Q, Land Use, of the Draft EIR, single family residential development and other uses proposed by the project are permitted uses within areas designated for agricultural uses. As analyzed on pages 4.Q-26 through 4.Q-30, the project would be consistent with the County zoning ordinance and no zone change is necessary. The analysis also concludes that the project would be consistent with the County General Plan. Furthermore, the zoning proposed for the site under the pending SCAP update is for residential uses, with the potential for development of approximately 1,700 dwelling units, which does not conflict with the residential uses proposed by the project.

RESPONSE NO. J2-7

Comment noted. Individual responses to concerns regarding water supply are provided below in Responses J2-14 through J2-24.

RESPONSE NO. J2-8

Please see Response H1-11 in Volume I of the Final EIR. As further discussed in the response, the DMS was used in association with the project and is included in Appendix A of the Draft EIR. Also, see the response regarding the EIR's evaluation of project impacts in association with 48 related projects. The suggestion that an update to the DMS be conducted for the project, the DMS is intended to be employed in the Initial Study phase of the environmental review process. As previously indicated, a fundamental purpose of the Initial Study, which was prepared with consideration of the DMS data, is to identify environmental issues that require more in-depth analysis in an EIR. The Skyline Ranch EIR was comprehensive in addressing 19 environmental issues with supporting technical reports provided in five volumes. The analyses provided in the EIR and its supporting appendices, which include consideration of projects approved or pending since the Notice of Preparation of the Skyline Ranch project was issued, go well beyond what would be provided with updated DMS data. The various analyses in the EIR that consider effects on public services, utilities and traffic also included consultation with the potentially affected agencies in order to evaluate the projects potential impacts and cumulative impacts.

RESPONSE NO. J2-9

Existing traffic levels were fully assessed and served as the basis for the analysis provided in Section 4.F, Traffic/Access of the Draft EIR, pages 4.F6 through 4.F-13. The statement that the 2004 analysis provided in the Initial Study found that impacts on fire service would not be significant is in error. As indicated on page 19 of the Initial Study, potential for impacts on fire and sheriff's services and response times are identified with a check in the "Yes" box, and accordingly, these issues were fully evaluated in the Draft EIR. The "No" box that is checked on the same page indicates that the site is undeveloped and that therefore there are no special problems with the project site or general area. Regarding the response times and the distance to the nearest fire station, as stated in Section 4.M, Fire Services and Hazards of the Draft EIR, on page 4.M-5, Fire Station 128 is planned to be operational by the end of 2010 and would be located approximately 0.75 miles from the site. Furthermore, the analysis provided on page 4.M-9 concludes that with two fire stations located within approximately one mile of the site, it is expected that response times for the project will be more than adequate.

RESPONSE NO. J2-10

As previously stated, the information provided during the Initial Study phase of the project in 2004 has been superseded and replaced with the extensive analyses conducted in association with the EIR. The analysis provided in the Draft EIR was completed in 2009 and takes into account case law and other factors that have influenced State water supply since 2004.

RESPONSE NO. J2-11

The impacts of the project on traffic, schools, water supply and sewer services and associated mitigation were fully addressed in the Draft EIR. With the exception of potential cumulative traffic impacts on Highway 14 that are assumed due to the speculative nature of the timing of improvements to the highway, impacts on schools, water supply and sewer services were determined in the EIR to be less than significant.

RESPONSE NO. J2-12

Analysis or data presented in 2004 was part of an Initial Study intended to identify issues with the potential to result in significant impacts that warranted further analysis in an EIR. Potential impacts associated with waste water were fully addressed well beyond what was provided in 2004 in Section 4.J, Wastewater Disposal, of the Draft EIR. A full reading of this section of the EIR makes it clear that the analysis and the adequacy of wastewater services was based on consultation

with and information provided by the County Sanitation District. Also note, in Appendix J, Sewer Study Report, of the Draft EIR, in their letter dated November 27, 2006, the County Sanitation District indicates that annexation into the Santa Clarita Valley Sanitation District is required before service can be provided, however, this does not pose a constraint as they also indicate that payment of a sewer connection fee will mitigate the impact of the project on the Sewerage System and that they intend to provide service to the project.

RESPONSE NO. J2-13

A specific response cannot be provided to the general comment that the Draft EIR either omits or finds the project to be consistent with all policies of the General Plan. However, it should be stated that the consistency of the project with the applicable land use plans and the General Plan is thoroughly addressed in Section 4.Q, Land Use, of the Draft EIR. There was no intent to omit policies for evaluation; rather, all policies considered relevant to the proposed project were evaluated. It is correct that the analysis concluded that the project would be consistent with the existing land use plans, policies and regulations relevant to the project that are focused on preventing impacts on the environment.

RESPONSE NO. J2-14

This comment accurately reflects a statement made in Appendix I-2 of the Draft EIR, Water Supply Assessment. It does not address the contents or adequacy of the Final EIR.

RESPONSE NO. J2-15

This comment similar to Comment E1-23 in Volume I of the Final EIR, see Response E1-23 in Volume I of the Final EIR. Additionally, the California Department of Water Resources (DWR) recently issued the 2009 Draft State Water Project (SWP) Reliability Report⁵, which the Castaic Lake Water Agency (CLWA) is using as guidance for assessing the availability of SWP water supplies.⁶ The Draft 2009 SWP Reliability Report incorporates regulatory requirements for SWP and Central Valley Project operations in accordance with U.S. Fish and Wildlife Service and National Marine Fisheries Service biological opinions. Estimates of future reliability also reflect potential impacts of climate change and sea level rise. The Draft 2009 SWP Reliability Report is the most current information available.

⁵ California Department of Water Resources, *Draft 2009 State Water Project Reliability Report*, 2010.

⁶ Ford, Jeff, *Water Resources Planner, Castaic Lake Water Agency*, 2010.

Table 1 compares estimates of SWP Table A deliveries for current (2009) conditions for average and dry years that were included in the 2007 SWP Delivery Reliability Report with those from the Draft 2009 report. As shown, 2009 estimates of updated SWP deliveries under current conditions during average conditions are slightly less than the 2007 estimates and estimated deliveries during dry periods are essentially the same.

Table 1

Average and Dry Period SWP Table A Deliveries from the Delta under Current Conditions

Study of Current Conditions	SWP Table A Delivery from the Delta (in percent of maximum Table A) ^a					
	Long-term Average ^b	Single dry-year (1977)	2-year drought (1976-1977)	4-year drought (1931-1934)	6-year drought (1987-1992)	6-year drought (1929-1934)
2007 SWP Reliability Report, Study 2007 ^b	63%	6%	34%	35%	35%	34%
Updated Studies (2009) ^c	60%	7%	36%	34%	35%	34%

^a Maximum Table A Amount is 4,133 thousand acre feet/year.

^b Values reflect averaging annual deliveries from the two scenarios of Old and Middle River flow targets.

Source: California Department of Water Resources, 2009 State Water Project Delivery Reliability Report, 2010, Table 6.4.

Table 2 compares estimates of SWP Table A deliveries for future (2029) conditions for average and dry years that were included in the 2007 SWP Delivery Reliability Report with those from the Draft 2009 SWP Reliability Report. As indicated, estimates of updated SWP deliveries during dry periods are about the same as the 2007 report for four-year and six-year droughts. Deliveries during the 2-year drought are estimated to increase by 11 to 12 percent when compared to the 2007 estimate, and deliveries during a single dry year are estimated to increase by 4 to 5 percent.

Thus, the 2009 projections for average deliveries are somewhat lower than those included in the 2007 SWP Reliability Report, but under some scenarios, deliveries would be similar or even greater. CLWA has evaluated its water supplies in light of the 2009 Draft SWP Reliability Report and has concluded that they remain adequate through 2030 for the forecasted demand in the 2005 UWMP as previously reported⁷. The conclusions of the Draft EIR and the Water Supply Assessment for the proposed project remain unchanged.

⁷ Ford, Jeff, *Water Resources Planner, Castaic Lake Water Agency, 2010.*

Table 2

Average and Dry Period SWP Table A Deliveries from the Delta under Future Conditions

Study of Future Conditions	SWP Table A Delivery from the Delta (in percent of maximum Table A) ^a					
	Long-term Average	Single dry-year (1977)	2-year drought (1976-1977)	4-year drought (1931-1934)	6-year drought (1987-1992)	6-year drought (1929-1934)
2007 SWP Reliability Report, Study 2027 ^b	66-69%	6-7%	26-27%	32-37%	33-35%	33-36%
Updated Studies (2029)	60%	11%	38%	35%	32%	36%

^a Maximum Table A Amount is 4,133 thousand acre feet/year.

^b Range in values reflects four modified scenarios of climate change: annual Table A deliveries were first interpolated between full 2050 level and no climate change scenarios, then averaged over the two scenarios of Old and Middle River flow targets.

Source: California Department of Water Resources, Draft 2009 State Water Project Delivery Reliability Report, 2010, Table 6.13.

RESPONSE NO. J2-16

This comment does not address the contents or adequacy of the Final EIR. Moreover, as indicated in Response J2-15, CLWA recently has determined that its water supplies are still adequate until 2030 for the forecasted demand in the 2005 UWMP. The comment regarding the current SWP allocation is noted. It is common practice for DWR to forecast low deliveries at the beginning of the year and increase them as appropriate depending on the hydrologic conditions. During 2009, for example, the initial SWP allocation was 15 percent, but DWR ultimately increased it to 40 percent.

The comment regarding Article 21 water also is noted; as discussed in CLWA's 2005 Urban Water Management Plan (UWMP), "Article 21 water is made available on an unscheduled and interruptible basis and is typically available only in average to wet years, generally only for a limited time in the late winter."⁸ As such, it is not a source that is relied upon by CLWA for its long-range planning, and its lack of availability in recent years does not affect the impact analysis included in the Draft EIR.

The comment correctly notes that some of CLWA's storage contracts are due to expire in the near future. Although CLWA is in negotiations to extend these contracts,⁹ a portion of CLWA's

⁸ Castaic Lake Water Agency, 2005 Urban Water Management Plan, Prepared for the Castaic Lake Water Agency, CLWA Santa Clarita Water Division, Newhall County Water District, Valencia Water Company. November 2005.

⁹ Ford, Jeff, Water Resources Planner, Castaic Lake Water Agency, 2010.

contract with the Semitropic Water Storage District currently is due to expire in 2012, and the other portion is due to expire in 2013. This is disclosed in the Draft EIR, which states on page 4.I-30 that “Under the terms of both storage agreements, water can be stored for up to 10 years and 90 percent of the amount stored by CLWA, or 50,870 af, is recoverable through 2013 to meet demands in the CLWA service area. Water not recovered by CLWA after 2013 will be forfeited.” The section further notes that “Implementation of groundwater banking agreements with Semitropic does not change the long-term, year-by-year water supply available for use in the Santa Clarita Valley. However, implementation of these agreements does improve the reliability of supplies for use within the CLWA service area because water stored in Semitropic could be used to augment dry-year supplies sometime in the future.” The Draft EIR correctly reflects the 2005 UWMP, which considers this water a short-term, dry-year supply only; the termination of the contracts would not change the conclusions of the Draft EIR.

The comment regarding delivery rights has no bearing on the contents or adequacy of the impact analysis. CLWA has delivery rights for its water supplies and thus is able to obtain the water for which it has contractual rights; it purchased the delivery right mentioned in the comment in order to extract water quickly at the time, not because it could not take delivery of the water.¹⁰

RESPONSE NO. J2-17

This comment is identical to Comment E1-24 in Volume I of the Final EIR, see Response E1-24 in Volume I of the Final EIR.

RESPONSE NO. J2-18

This comment is identical to Comment E1-25 in Volume I of the Final EIR, see Response E1-25 in Volume I of the Final EIR. Also refer to Response No. J1-26 above regarding the availability of SWP water supplies.

RESPONSE NO. J2-19

This comment is similar to Comment E1-26 in Volume I of the Final EIR, see Response E1-26 in Volume I of the Final EIR.

¹⁰ Ford, Jeff, *Water Resources Planner, Castaic Lake Water Agency, 2010.*

RESPONSE NO. J2-20

This comment is similar to Comment E1-26 in Volume I of the Final EIR, see Response E1-26 in Volume I of the Final EIR.

RESPONSE NO. J2-21

This comment is similar to Comment E1-27 in Volume I of the Final EIR, see Response E1-27 in Volume I of the Final EIR.

RESPONSE NO. J2-22

SCOPE's concurrence with the Sierra Club comment is noted; it is not a comment on the contents or adequacy of the Final EIR. The comment that the facilities are not currently operating is accurate; however, the 2005 UWMP (Tables 6-3 and 6-4) shows that they are not needed until 2020 and then only in single dry and multiple dry years. Regarding wells in the Saugus Formation, Figure 3-3 of CLWA's 2005 UWMP shows the locations of existing wells. It is not accurate to state that "there are no studies to indicate that that water is really even available." Page 4.I-8 states: "Following adoption of the GWMP in 2003, two (2) formal reports were produced under an MOU between CLWA, the Local Purveyors, and United Water Conservation District (UWCD). The first report, dated April 2004, documents the construction and calibration of the groundwater flow model for the Santa Clarita Valley. The second report, dated August 2005, presents the modeling analysis of the Local Purveyors' groundwater operating plan. The primary conclusion of the modeling analysis is that the groundwater operating plan is sustainable because it will not cause detrimental short- or long-term effects to the groundwater and surface water resources in the Valley."

Section 3.3.2.1.2 of the 2005 UWMP also discusses the groundwater flow model that was used to assess groundwater supplies in the Saugus Formation. Yields described in the 2005 UWMP are consistent with the studies conducted for the CLWA's Groundwater Management Plan¹¹.

RESPONSE NO. J2-23

This comment is similar to Comment E1-29 in Volume I of the Final EIR, see Response E1-29 in Volume I of the Final EIR.

¹¹ *Castaic Lake Water Agency, Groundwater Management Plan, Santa Clara River Valley Groundwater Basin, East Subbasin, Los Angeles County, California, December 2003.*

RESPONSE NO. J2-24

The Draft EIR addressed water resources in Section 4.I, Water Resources, with supporting data provided in Appendix I of the Draft EIR. The comment suggests inclusion of mitigation to require compliance with state law and County ordinances and to include specific design standards. The project will comply with state law and the County's Green Building Program, as applicable and as discussed in Section 4.I, Water Resources, and Section 4.B, Hydro/Water Quality, of the Draft EIR.

The comment does not specifically identify a State Landscape Ordinance. It is assumed that comment refers to the Water Conservation in Landscaping Act of 2006 (Assembly Bill 1881), which requires cities and counties to adopt landscape water conservation ordinances by January 1, 2010. If the local agency does not adopt a landscape water conservation ordinance by January 1, 2010, the state law requires that the Updated Model Water Efficient Landscape Ordinance prepared by the State Department of Water Resources shall apply within the jurisdiction of that local agency as of that date. The County of Los Angeles on November 14, 2008 adopted a Green Building Program, which includes a Drought-Tolerant Landscaping ordinance, a Green Building ordinance and a Low Impact Development ordinance. The project will comply with the County Green Building Program as applicable.

The analysis in the Draft EIR demonstrates that impacts of the proposed project related to water supply, infrastructure and groundwater recharge would be less than significant, and requires compliance with mitigation measures to further reduce less-than-significant impacts to water supply. The feasibility for the proposed project of the design standards suggested by the comment has not been determined, however, they are not needed to reduce a significant impact of the project. The project will incorporate best management practices to promote ground water recharge and will comply with the County Low Impact Development ordinance, as applicable.

RESPONSE NO. J2-25

Wastewater Disposal is addressed in Section 4.J, Wastewater Disposal, of the Draft EIR. Regarding the need for the project to annex to the Sanitation District see Response to Comment J2-12. The statement that no sewer facilities or pipes are available to service the project is in error. As stated on page 4.J-2 of the Draft EIR, areas adjacent to the site are developed and support wastewater infrastructure which can serve the project site. Regarding the suggestion that there are issues that could compromise the ability to provide sewer service to the site, see Response to Comment J2-12.

RESPONSE NO. J2-26

Reference to the suggested need for and feasibility of a “package” sewer plant is unclear. As stated on page 4.J-3, in Section 4.J, Wastewater Disposal, of the Draft EIR, the Santa Clarita Valley Joint Sewerage System has a sewage treatment capacity of 7 million gallons per day(mgd) available to serve the project with an additional 6 mgd expected by 2015. Also, see Response to Comment J2-12.

RESPONSE NO. J2-27

Regarding the provision of all feasible mitigation to mitigate air quality and climate change impacts, see Section 4.S, Global Climate Change and Section 4.H, Air Quality of the Draft EIR and Final EIR. Relevant project objectives, features and mitigation measures that address air quality and climate change are provided on pages 4.S-23 through 4.S-29 of the Draft EIR. As concluded on page 4.S-29, with implementation of project features, recommended GHG reduction measures, mitigation measures, and compliance with the County Green Building Ordinances, the project would be consistent with AB32 and the California Climate Action Team strategies for reducing greenhouse gas (GHG) emissions.

In addition, revisions to the CEQA Guidelines, effective March 18th 2010, provide new guidance on how to approach evaluation of GHG emissions under CEQA. The analysis provided in the Draft EIR and Final EIR is consistent with this guidance in quantifying the amount of GHG resulting from the project, comparing the change to existing environmental conditions, evaluating project compliance with requirements for reducing or mitigation GHG emissions, and by providing measures to mitigate GHG emissions through adherence with the County Green Building Ordinances, project design, project features, and other measures. Also, it should be noted that “Calgreen”, the State Green Building Code, has been adopted as part of Title 24 and will be applicable to the proposed project.

PCR SANTA MONICA

233 Wilshire Boulevard
Suite 130
Santa Monica, CA 90401
TEL 310.451.4488
FAX 310.451.5279
EMAIL info@pcrnet.com

PCR IRVINE

One Venture
Suite 150
Irvine, CA 92618
TEL 949.753.7001
FAX 949.753.7002
EMAIL info@pcrnet.com

PCR PASADENA

55 South Lake Avenue
Suite 215
Pasadena, CA 91101
TEL 626.204.6170
FAX 626.204.6171
EMAIL info@pcrnet.com